

Polek, Jim

From: Greenberg, Ken
Sent: Wednesday, December 17, 2014 9:35 AM
To: Albright, David
Cc: TROMBADORE, CLAIRE
Subject: RE: Ventura County Waste Water Issues

David – thanks for looking into this. Anything you can find on Anterra’s compliance with the DOGGR permit requirements would be useful. And, whether they can maintain compliance with the increased waste load their handling from companies that previously disposed at the now-closed Santa Clara Wastewater facility. Finally, wondering if there are any other underground injection requirements that Anterra would need to comply with other than the DOGGR permit.

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From: Albright, David
Sent: Tuesday, December 16, 2014 5:46 PM
To: Greenberg, Ken
Cc: TROMBADORE, CLAIRE
Subject: RE: Ventura County Waste Water Issues

Hi Ken,

We are still tracking down information on the Anterra injection well, although it appears to be a Class II well permitted by DOGGR. Anterra had applied to EPA for a Class I injection well permit a few years ago, but they withdrew their permit application. I’ll keep you posted on what we learn, but as this progresses, if you have specific questions please let me know. Thanks, David

From: Greenberg, Ken
Sent: Tuesday, December 09, 2014 6:04 PM
To: Polek, Jim; Whitson, Amelia; Albright, David
Cc: TROMBADORE, CLAIRE
Subject: FW: Ventura County Waste Water Issues

See e-mail chain below. Looks like Superfund will take the lead on convening a multi-Division meeting to discuss EPA follow-up on the Santa Clara Wastewater facility in Santa Paula. This is the centralized waste treatment facility that had an explosion a few weeks ago. So this is a heads-up about possible upcoming meeting.

Second issue is that I’m curious to know more about the Anterra facility that Tom Dunkelman mentions as the only other waste handling facility in Ventura County other than Santa Clara Wastewater. Here’s a link to their website:
<http://anterraservices.com/>

Jim, could you please look to see if Anterra has a discharge to the Oxnard WWTP and if they do, what's their compliance status. Their web site says they dispose waste to an injection well, but I suppose it's possible that they also discharge to Oxnard as Santa Clara did. I scanned Oxnard's pretreatment annual report and didn't see Anterra listed in their SIU inventory so this might be the answer.

David, do you know anything about an injection well permit for Anterra or their UIC compliance?

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From: Manzanilla, Enrique
Sent: Tuesday, December 09, 2014 5:04 PM
To: Dunkelman, Tom; Strauss, Alexis
Cc: Greenberg, Ken; Allen, HarryL; Waldon, MARGARET; Powell, Martin; Kao, Jessica; Salyer, Kathleen; Lawrence, Kathryn; Minor, Dustin; Johnson, Kathleen; Scott, Jeff; Diamond, Jane; Lindsay, Nancy; Berg, Elizabeth
Subject: RE: Ventura County Waste Water Issues

Alexis:

We will work with Enforcement Division on the convening part but remain primarily focused on the clean-up. Although there may be RMP general duty issues at the Santa Clara facility (if I remember correctly, they are not an RMP facility), I imagine compliance with other delegated regulatory programs probably will have more relevance to this facility.

From: Dunkelman, Tom
Sent: Tuesday, December 09, 2014 4:46 PM
To: Strauss, Alexis
Cc: Greenberg, Ken; Allen, HarryL; Manzanilla, Enrique; Waldon, MARGARET; Powell, Martin; Kao, Jessica
Subject: Re: Ventura County Waste Water Issues

The permit I referred to is a conditional use permit issued by the Ventura County Planning department. The permit expires in 2016 or 2018 (I heard both dates today and am not sure which is accurate).

Sent from my iPhone

On Dec 9, 2014, at 3:40 PM, "Strauss, Alexis" <Strauss.Alexis@epa.gov> wrote:

Tom, thanks for representing EPA before the Ventura Supervisors. When you refer below to the expiring permit, who issued that permit?

Enrique, Harry, Ken: I suggest it's timely that we convene the key R9 programs and determine the compliance status of these two facilities from an EPA and Regional Water Board view, who has been using these commercial facilities, and what the alternatives may be.

Enrique: I've asked ORC, Enforcement and Water to pursue this...do you want Superfund to be involved, or remain focused on the removal?

From: Dunkelman, Tom

Sent: Tuesday, December 09, 2014 3:26 PM

To: Greenberg, Ken; Allen, HarryL; Manzanilla, Enrique; Strauss, Alexis

Cc: Waldon, MARGARET; Powell, Martin

Subject: Ventura County Waste Water Issues

Today I attended a meeting of the Ventura County Supervisors. The focus of the meeting had less to do with the current emergency response at the Santa Clara Waste Water facility, and more to do with the current and future status of the only two commercial wastewater treatment facilities in the County – Santa Clara and Anterra (which does underground injection). My only involvement in the meeting was to briefly respond to a question from one of the Supervisors regarding EPA involvement in the permitting and regulation of these facilities. I responded that the Superfund Emergency Response program was not involved in regulatory issues pertaining to these facilities, but would pass the question on.

There was a fairly sizeable audience and this seems likely to be a significant issue that would involve EPA in the future. Here is a quick summary of the issue.

The Santa Clara Waste Water facility had a fire and explosion three weeks ago, and has been shut down ever since, while the cleanup is ongoing. The facility faces very significant hurdles before (if?) it is allowed to re-open. These hurdles include an ongoing criminal investigation by the Ventura County DA. There is a 14 mile pipeline that extends from the Santa Clara facility to the City of Oxnard wastewater treatment plant. There have been at least two significant rad exceedances in the discharge from Santa Clara to the Oxnard plant, and consequently Oxnard is no longer accepting treated waste water from Santa Clara. There are also significant H₂S issues in the wastewater coming from Santa Clara. The City of Oxnard only receives about \$350,000 per year from Santa Clara, and it seems likely they may decide against allowing Santa Clara to discharge water to them in the future. This would appear to put the future of the Santa Clara Waste Water facility in question.

The only other commercial wastewater treatment facility in the County is the Anterra facility. This facility receives a much smaller range of waste streams (typically only oily water and brine from small oil producers). With the recent fire and explosion at Santa Clara, there is a lot of focus on the Anterra facility as well. During the meeting, there were many concerns raised regarding the safety of having a facility of this type in close proximity to schools and residences in Oxnard. EJ issues were also raised. There were an equal number of comments from the audience (primarily industry types), regarding the need to have this type of facility in the County and the associated jobs. With Santa Clara being closed, the Anterra facility has been allowed to receive a greater number of truckloads per day (44 – up from the permitted number of 24). This exemption ends on Saturday. The Anterra facility is also up for a new permit in the next two years or so.

I am not sure to what degree EPA is involved in the permitting and regulation of these two facilities, but I am sure there will additional questions and issues forthcoming. These issues seem to be heightened by the concern that some of the wastewater coming to both of these facilities may be related to fracking.